

February 14, 2019

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Via: ECF

Hon. Sandra J. Feuerstein, U.S. District Judge
United States District Court
Eastern District of New York
100 Federal Plaza, Chambers: 1014
Central Islip, New York 11722

Re: **“JOHN DOE,” a fictitious name v. CORY MAIER, et al.**
Venue: USDC, Eastern District of New York
Case No.: 2:18-cv-04956 (SJF) (AKT)
Our File No.: MISC-2018-08

Dear Honorable Judge Feuerstein:

We represent plaintiff, JOHN DOE, on the above captioned matter.

On **February 14, 2019**, and in accordance with the revised briefing schedule addressing defendants motion to dismiss the present action, and Your Honor’s “Individual Rules”, we served all parties with **PLAINTIFF’S MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF’S CROSS-MOTION FOR LEAVE TO FILE A VERIFIED SECOND AMENDED COMPLAINT PURSUANT TO RULE 15(a)(2) & FOR ADDITIONAL TIME TO SERVE PROCESS PURSUANT TO RULE 4(m), AND IN OPPOSITION TO DEFENDANTS’ MOTION TO DISMISS PURSUANT TO RULES 12(b)(5) & (6).** (See attached Email to all parties dated February 14, 2019.)

Thank you for your attention on this matter. Any questions, please contact the undersigned.

Very respectfully,

GALLO VITUCCI KLAR LLP



Richard González, Esq.

Enc.

Copy: Via ECF
All Parties

Richard Gonzalez

From: Thomas M. Grasso <tom@tmgrassolaw.com>
Sent: Thursday, February 14, 2019 12:33 PM
To: Michael Cassell
Cc: Bochner, Michelle; Knapp, James (USANYE); Richard Gonzalez; David Schneider
Subject: Doe v. Maier et al; 18 CV 4956 (SFJ)(AKT)
Attachments: NOTICE OF MOTION.pdf; PLNTF MEMO OF LAW CROSS-MOTION.pdf; FINAL Verified Second Amended Complaint.pdf; SIGNED Verification.pdf; GRASSO DECLARATION.pdf

Dear Counsel,

Attached please find:

1. Plaintiff's Memorandum of Law in Support of Plaintiff's Cross Motion for Leave to File a Verified Second Amended Complaint and in Opposition to Defendants' Motion to Dismiss;
2. Notice of Motion with Certificate of Service;
3. Proposed Verified Second Amended Complaint;
4. "John Doe's" Verification, which I ask that you consider as being "Under Seal" and confidential.
5. Grasso Declaration.

Thank you.

Very truly yours,

Thomas M. Grasso, Esq.

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